EXHIBIT 7

RBDS	DISPLAY TECHNOLOGIES	PAM	ROTHSCHILD
REQUEST NO. 34: Documents sufficient to show any transfer of funds or distributions made by any Defendant or a Related Company to You since 2016.	REQUEST NO. 29: Documents sufficient to show any transfer of funds or distributions made by any Defendant or a Related Company to You since 2016.	REQUEST NO. 49: Documents sufficient to show any transfer of funds or distributions made by any Defendant or a Related Company to You since 2016.	REQUEST NO. 52: Documents sufficient to show any transfer of funds or distributions made by any Defendant or a Related Company to You since 2016.
RESPONSE:	RESPONSE:	RESPONSE:	RESPONSE:
Defendant expressly incorporates each of the foregoing General Objections by reference.	Defendant expressly incorporates each of the foregoing General Objections by reference.	Defendant expressly incorporates each of the foregoing General Objections by reference.	Defendant expressly incorporates each of the foregoing General Objections by reference.
Defendant also objects to this Request to the extent it seeks documents and information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege or immunity.	Defendant also objects to this Request to the extent it seeks documents and information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege or immunity.	Defendant also objects to this Request to the extent it seeks documents and information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege or immunity.	Defendant also objects to this Request to the extent it seeks documents and information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege or immunity.
Defendant also objects to this Request to the extent it calls for documents not within the possession, custody, or control of Defendant.	Defendant also objects to this Request to the extent it is duplicative, cumulative, or otherwise redundant of other Requests or other discovery already available to Plaintiff.	Defendant also objects to this Request to the extent it is duplicative, cumulative, or otherwise redundant of other Requests or other discovery already available to Plaintiff.	Defendant also objects to this Request to the extent it is duplicative, cumulative, or otherwise redundant of other Requests or other discovery already available to Plaintiff.

Defendant also objects to this Request to the extent it is duplicative, cumulative, or otherwise redundant of other Requests or other discovery already available to Plaintiff.

Defendant also objects to this Request as overly broad, unduly burdensome, not proportional to the needs of the case, and seeking documents that are not relevant to any party's claims or defenses to the extent it seeks documents unrelated to the issues and/or parties involved in this case, namely Rothschild entities who are not parties to this action.

Subject to and without waiving its General and Specific objections, Defendant will not produce documents responsive to this Request because they are not relevant or proportional to the needs of the case.

REQUEST NO. 35:

Documents sufficient to show any transfer of funds or distributions made to any

Defendant also objects to this Request as overly broad, unduly burdensome, not proportional to the needs of the case, and seeking documents that are not relevant to any party's claims or defenses to the extent it seeks documents unrelated to the issues and/or parties involved in this case. In particular, this Request seeks documents related to Rothschild entities who are not parties to this action. It also seeks documents relating to any matter involving Defendants or Related Companies regardless of whether it relates to assertions of patent infringement.

Subject to and without waiving its General and Specific objections, Defendant will not produce documents responsive to this Request because they are not relevant or proportional to the needs of the case.

REOUEST NO. 30:

Documents sufficient to show any transfer of funds or distributions made to any

Defendant also objects to this Request as overly broad, unduly burdensome, not proportional to the needs of the case, and seeking documents that are not relevant to any party's claims or defenses to the extent it seeks documents unrelated to the issues and/or parties involved in this case. In particular, this Request seeks documents related to Rothschild entities who are not parties to this action. It also seeks documents relating to any matter involving Defendants or Related Companies regardless of whether it relates to assertions of patent infringement.

Subject to and without waiving its General and Specific objections, Defendant will not produce documents responsive to this Request because they are not relevant or proportional to the needs of the case.

REOUEST NO. 50:

Documents sufficient to show any transfer of funds or distributions made to any

Defendant also objects to this Request as overly broad, unduly burdensome, not proportional to the needs of the case, and seeking documents that are not relevant to any party's claims or defenses to the extent it seeks documents unrelated to the issues and/or parties involved in this case. In particular, this Request seeks documents related to Rothschild entities who are not parties to this action. It also seeks documents relating to any matter involving Defendants or Related Companies regardless of whether it relates to assertions of patent infringement.

Subject to and without waiving its General and Specific objections, Defendant will not produce documents responsive to this Request because they are not relevant or proportional to the needs of the case.

REOUEST NO. 53:

Documents sufficient to show any transfer of funds or distributions made to any

Defendant or a Related Company by You since 2016.

RESPONSE:

Defendant expressly incorporates each of the foregoing General Objections by reference.

Defendant also objects to this Request to the extent it calls for documents not within the possession, custody, or control of Defendant.

Defendant also objects to this Request to the extent it is duplicative, cumulative, or otherwise redundant of other Requests or other discovery already available to Plaintiff.

Defendant also objects to this Request as overly broad and unduly burdensome, not proportional to the needs of the case, and seeking information that is not relevant to any party's claims or defenses.

Defendant also objects to this Request as overly broad,

Defendant or a Related Company by You since 2016.

RESPONSE:

Defendant expressly incorporates each of the foregoing General Objections by reference.

Defendant also objects to this Request to the extent it seeks documents and information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege or immunity.

Defendant also objects to this Request to the extent it calls for documents not within the possession, custody, or control of Defendant.

Defendant also objects to this Request to the extent it is duplicative, cumulative, or otherwise redundant of other Requests or other discovery already available to Plaintiff.

Defendant or a Related Company by You since 2016.

Filed 05/16/25

RESPONSE:

Defendant expressly incorporates each of the foregoing General Objections by reference.

Defendant also objects to this Request to the extent it seeks documents and information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege or immunity.

Defendant also objects to this Request to the extent it calls for documents not within the possession, custody, or control of Defendant.

Defendant also objects to this Request to the extent it is duplicative, cumulative, or otherwise redundant of other Requests or other discovery already available to Plaintiff.

Defendant or a Related Company by You since 2016.

RESPONSE:

Defendant expressly incorporates each of the foregoing General Objections by reference.

Defendant also objects to this Request to the extent it seeks documents and information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege or immunity.

Defendant also objects to this Request to the extent it calls for documents not within the possession, custody, or control of Defendant.

Defendant also objects to this Request to the extent it is duplicative, cumulative, or otherwise redundant of other Requests or other discovery already available to Plaintiff.

unduly burdensome, not proportional to the needs of the case, and seeking documents that are not relevant to any party's claims or defenses to the extent it seeks documents unrelated to the issues and/or parties involved in this case.

Subject to and without waiving its General and Specific objections, Defendant will not produce documents responsive to this Request because they are not relevant or proportional to the needs of the case.

REQUEST NO. 37: All

audited and unaudited profit-

and-loss statements, balance

sheets, cash-flow statements,

any Defendant or Related

Company from 2016 to the

and other financial records for

Defendant also objects to this Request as overly broad, unduly burdensome, not proportional to the needs of the case, and seeking documents that are not relevant to any party's claims or defenses to the extent it seeks documents unrelated to the issues and/or parties involved in this case, namely Rothschild entities who are not parties to this action.

Subject to and without waiving its General and Specific objections, Defendant will not produce documents responsive to this Request because they are not relevant or proportional to the needs of the case.

REQUEST NO. 32: All audited and unaudited profitand-loss statements, balance sheets, cash-flow statements, and other financial records for any Defendant or Related Company from 2016 to the present.

RESPONSE:

Defendant also objects to this Request as overly broad, unduly burdensome, not proportional to the needs of the case, and seeking documents that are not relevant to any party's claims or defenses to the extent it seeks documents unrelated to the issues and/or parties involved in this case, namely Rothschild entities who are not parties to this action.

Subject to and without waiving its General and Specific objections, Defendant will not produce documents responsive to this Request because they are not relevant or proportional to the needs of the case.

REQUEST NO. 52: All audited and unaudited profitand-loss statements, balance sheets, cash-flow statements, and other financial records for any Defendant or Related Company from 2016 to the present.

RESPONSE:

Defendant also objects to this Request as overly broad, unduly burdensome, not proportional to the needs of the case, and seeking documents that are not relevant to any party's claims or defenses to the extent it seeks documents unrelated to the issues and/or parties involved in this case, namely Rothschild entities who are not parties to this action.

Subject to and without waiving its General and Specific objections, Defendant will not produce documents responsive to this Request because they are not relevant or proportional to the needs of the case.

REQUEST NO. 55: All audited and unaudited profitand-loss statements, balance sheets, cash-flow statements, and other financial records for any Defendant or Related Company from 2016 to the present.

RESPONSE:

RESPONSE:

present.

Defendant expressly incorporates each of the foregoing General Objections by reference.

Defendant also objects to this Request to the extent it calls for documents not within the possession, custody, or control of Defendant.

Defendant also objects to this Request as overly broad, unduly burdensome, not proportional to the needs of the case, and seeking documents that are not relevant to any party's claims or defenses to the extent it seeks documents unrelated to the issues and/or parties involved in this case and because it seeks documents over a period of nearly a decade.

Defendant further objects to this Request as vague and ambiguous as to what is encompassed by "other financial records."

Subject to and without waiving its General and Specific

Defendant expressly incorporates each of the foregoing General Objections by reference.

Defendant also objects to this Request to the extent it calls for documents not within the possession, custody, or control of Defendant.

Defendant also objects to this Request as overly broad, unduly burdensome, not proportional to the needs of the case, and seeking documents that are not relevant to any party's claims or defenses to the extent it seeks documents unrelated to the issues and/or parties involved in this case and because it seeks documents over a period of nearly a decade.

Defendant further objects to this Request as vague and ambiguous as to what is encompassed by "other financial records."

Subject to and without waiving its General and Specific

Defendant expressly incorporates each of the foregoing General Objections by reference.

Defendant also objects to this Request to the extent it calls for documents not within the possession, custody, or control of Defendant.

Defendant also objects to this Request as overly broad, unduly burdensome, not proportional to the needs of the case, and seeking documents that are not relevant to any party's claims or defenses to the extent it seeks documents unrelated to the issues and/or parties involved in this case and because it seeks documents over a period of nearly a decade.

Defendant further objects to this Request as vague and ambiguous as to what is encompassed by "other financial records."

Subject to and without waiving its General and Specific

Defendant expressly incorporates each of the foregoing General Objections by reference.

Defendant also objects to this Request to the extent it calls for documents not within the possession, custody, or control of Defendant.

Defendant also objects to this Request as overly broad, unduly burdensome, not proportional to the needs of the case, and seeking documents that are not relevant to any party's claims or defenses to the extent it seeks documents unrelated to the issues and/or parties involved in this case and because it seeks documents over a period of nearly a decade.

Defendant further objects to this Request as vague and ambiguous as to what is encompassed by "other financial records."

Subject to and without waiving his General and Specific

| objections, Defendant will not |
|---------------------------------|---------------------------------|---------------------------------|---------------------------------|
| produce responsive documents | produce responsive documents | produce responsive documents | produce responsive documents |
| because they are irrelevant |
| and/or not proportionate to the |
| needs of the case. |
| | | | |